

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LOUIS DREYFUS CORPORATION,

Plaintiff,

-against-

M/V CMA CGM CORTES, her engines,
boilers, tackle, etc., ALPHA
SHIPMANAGEMENT GMBH & CO., KG, ALPHA
SHIP GMBH & CO. KG MS "NEPTUN",
COMPANIA SUD AMERICANA DE VAPORES S.A.
(C.S.A.V.),

Defendants.
-----X

07 CV 6622 (WHP)

RESPONSE TO NOTICE
TO ADMIT

Defendant COMPANIA SUD AMERICANA DE VAPORES S.A. (C.S.A.V.)
("CSAV"), responds, seriatim, to plaintiff's Notice to admit dated
August 23, 2007, upon information and belief, as follows:

1-6. CSAV objects to plaintiff's Notice to Admit as
premature. Fed. R. Civ. P. 36(a) ("Without leave of court or
written stipulation, requests for admission may not be served
before the time specified in Rule 26(d)."). CSAV denies the
allegations. CSAV reserves the right to supplement or amend any or
all of the foregoing up to and including the time of trial.

Dated: New York, New York
August 30, 2007

Yours, et cetera,

MAHONEY & KEANE, LLP
Attorneys for Defendant
COMPANIA SUD AMERICANA DE VAPORES SA

By: 

Edward A. Keane (EK 1398)
111 Broadway, Tenth Floor
New York, New York 10006
(212) 385-1422

TO: KINGSLEY KINGSLEY & CALKINS
Attorneys for Plaintiff
91 West Cherry Street
Hicksville, New York 11801
(516) 931-0064


STATE OF NEW YORK :
 : SS.:
COUNTY OF NEW YORK :

MARIE T. CUSH being sworn says: I am not a party to the action, am over 18 years of age and reside at 311 Travers Place, Lyndhurst, N.J.

On August 30, 2007, I served a true copy of the annexed RESPONSE TO NOTICE ADMIT

TO: KINGSLEY KINGSLEY & CALKINS
Attorneys for Plaintiff
91 West Cherry Street
Hicksville, New York 11801
(516) 931-0064

on this date by mailing the same in a sealed envelope, with postage prepaid thereon, in an official depository of the U.S. Postal Service.


MARIE T. CUSH

Sworn to before me this
30th day of August, 2007


Notary Public

